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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, SEATTLE**

JOEL HODGELL,

Plaintiff,

v.

**YVES ROCHER NORTH AMERICA
(a foreign corporation), YVES
ROCHER (U.S.A.) INC., (a Delaware
corporation),
YVESROCHERUSA.COM, and
JOHN DOES 1-20,**

Defendants,

NO. CO5-2035 TSZ

**PLAINTIFF'S FRCP 26(A)(1)
[AMENDED] INITIAL
DISCLOSURES**

**TO: YVES ROCHER NORTH AMERICA, YVES ROCHER (U.S.A.) INC.,
YVESROCHERUSA.COM, and JOHN DOES 1-20**

AND TO: Derek Newman and Roger Townsend, Newman & Newman, LLP

Pursuant to FRCP 26(a)(1), Plaintiff Joel Hodgell provides the following initial disclosures. Plaintiff reserves the right to supplement these disclosures pursuant to FRCP 26(e)(1). Plaintiff's disclosures do not provide contact information that is unavailable to them at this time, that is currently in Plaintiff's possession, or that is more readily available to Plaintiff.

PLAINTIFFS' INITIAL DISCLOSURES - 1

MERKLE SIEGEL & FRIEDRICHSEN
1325 Fourth Ave., Suite 940
Seattle, WA 98101
Phone: 206-624-9392
Fax: 206-624-0717

I. FED. R. CIV. P. 26(a)(1)(A): INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION:

Plaintiff, Joel Hodgell: 12712 Lake City Way NE, #3, Seattle, WA 98125
(206) 362.2166

Defendants

Indros Technologies, Inc.: 1 Meadow St, Suite 202, Brooklyn, NY 11206
Broad Vision Group, Inc.; Broad Vision Media Group, Inc. (address unknown),
GMB Direct: 877-462-3473 ext. 111, Gene Miller; and other entities who may
have assisted, or conspired with Defendants to send unlawful email in violation of
Washington statutes, as discovery may reveal.

II. FED. R. CIV. P. 26(a)(1)(B): DOCUMENTS, DATA COMPILATIONS, & TANGIBLE THINGS

Copies of offending emails (have been provided in pdf format to Defendant for
the sake of efficiency).

Other data compilations are in the possession of Defendant, and/or its agents, and
are expected to be produced in discovery.

III. FED. R. CIV. P. 26(a)(1)(C): COMPUTATION OF DAMAGES

Defendant is alleged to have sent at least 60 unlawful emails in violation of the
subject statutes for statutory damages as follows:

\$30,000 at \$500 per violation under RCW 19.190.040(1);

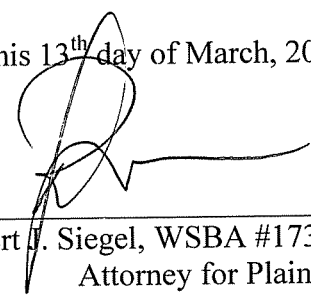
\$60,000 at \$1,000 per violation under RCW 9.35;

Treble damages for each violation in the amount of \$270,000 under RCW
19.86.090; plus costs and attorney fees as provided in the subject statutes;

IV. FED. R. CIV. P. 26(a)(1)(D): INSURANCE AGREEMENTS

None known.

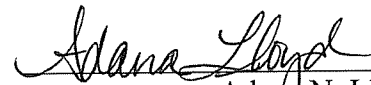
Dated this 13th day of March, 2006


Robert J. Siegel, WSBA #17312
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2006, I electronically filed **Plaintiff's Amended Initial Disclosures** with the Clerk of the Court using the CM/ECF System which will send notification of such filing to Derek A. Newman.


Adana N. Lloyd

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